Records Management Program – Policies & Procedures ▬▬▬▬▬▬▬

MCI PROCEDURES
FOR
VENDOR OFF-SITE RECORDS MANAGEMENT AND STORAGE

GENERAL REQUIREMENT

The following are general requirements for records management services to be provided by the Contractor.

A. The Contractor will assign to the MCI account, at a minimum: An Account Manager and appropriate Customer Support personnel in each district.

B. All records storage, accession, retrieval, refile and destruction services shall be in accordance with MCI's Records Retention Schedule ("RRS") which is attached hereto.

C. The Contractor shall only use electronic mail to communicate with MCI sites for the purpose of receiving and acknowledging service requests, unless other communication methods have been approved by RIM in writing.

D. All communications with MCI end-users, no matter the subject matter, will be 'copied' (cc) to RIM.

E. The Contractor's customer support personnel must be knowledgeable about and cross-trained on all aspects of the MCI's account. Support personnel must be able to answer questions from local users, receive and initiate orders, communicate with MCI users and must make every effort to answer billing, service and operational issues within 24 hours.

F. The Contractor will maintain an in-house box tracking system which captures the following data:

A 03790

Field	Field Type	Characters
MCI department	alpha numeric	8
Carton Barcode Number	alpha numeric	vendor specific
Reference Number	alpha numeric	
Record series #	alpha numeric	5
From date	date	8
Thru date	date	8
Contents Description	alpha numeric	55
Retention Hold Code	alpha numeric	3
Destruction Review Date	date	8
Service Order Number (SO cartons were received on)	alpha numeric	vendor specific
Order Requestor (MCI submitter)	alpha	20
Service Date (date cartons were received)	date	8

G. MCI's Records Retention Schedule must be incorporated into the Contractor's data system. Destruction dates must be calculated using the RRS data and thru dates.

H. The MCI Box Inventory Form will be utilized exclusively.

I. Inventory forms must accompany all cartons sent to storage. Cartons without accompanying inventory forms will not be accepted for picked up. All fields must be entered in to the Contractor's system, to include the Retention Code if completed. (For the "Record Classification Code" field, enter "RS" with the corresponding number entered by the submitter. For example: RS45.)

J. File-level indexing. All cartons that have been file-level indexed will be accompanied by the MCI Carton / File-Level Inventory Form (see Attachment III for copy). This form must be completed in full, to include data for all files contained in the carton.

   Prior to receipt by the contractor, each carton will contain a carton barcode number, and each file will have assigned a six-digit file identification number. The carton barcode number and the file identification numbers will be included in the inventory data on the File-Level Inventory Form and will be entered in to the Contractor's system.

   Upon receipt, the Contractor must verify the contents of each carton against the accompanying inventory form.

K. Only RIM personnel, or MCI personnel given authorization by RIM, can authorize the permanent withdrawal of any MCI records. A list of authorized personnel will be given to Contractor. A request for permanent withdrawal, from authorized personnel, must be received by the Contractor in writing.

Records Management Program – Policies & Procedures ▬▬▬▬▬▬▬▬

L. The Contractor will provide MCI with an electronic version of their inventory data contained within Contractor's inventory system in an agreed upon format.

M. The Contractor shall exercise disaster recovery procedures as described in Exhibit B, of this contract.

REPORTING

MCI's requirements with regard to reporting and invoicing for the Contractor's account are as follows:

A. The following reports will be delivered to MCI as outlined below, in mutually agreed upon formats:

1) New box storage activity report (monthly). Due the 15th of each month, reporting on the previous month. Contains: All new storage for that month. This report will be sorted by MCI department.

2) Retrieval / Outcard Report (quarterly). Due April 15th, July 15th, October 15th, and January 15th. Contains: This report lists all retrievals outcarded for more than one day. This report will be sorted by the retriever's name.

3) Inventory Report (annually). Due March 31st or after the annual destruction project is completed. Contains: Full inventory listing. This report will be sorted by Record Classification Code.

4) Candidates for destruction (annually). Due November 15th. Contains: All cartons eligible for destruction as of the end of that calendar year, in accordance with MCI's Record Retention Schedule. This report will be sorted by Record Classification Code.

5) Retention Hold Code (annually). Due June 30th. Contains: Lists all cartons assigned a Retention Hold Code. This report will be sorted by the Retention Hold Code.

    Items 1, 3, 4 & 5 above will contain the information/fields listed under item I, herein, "General Requirements".

    Item 2, the Retrieval / Outcard Report, will contain MCI department, carton barcode number, carton description, Record Classification Number, name of the MCI requestor, the date of retrieval and the service order number.

B. All reporting and invoicing will be provided to MCI using the exact same cut-off date. That cut off date will be the last business of the month.

RETRIEVAL / REFILE / NEW STORAGE

The Contractor shall provide retrieval/refile and storage services at locations as designated and agreed to by MCI and the Contractor. These services include the following specific requirements:

MCIWC031851

58

A 03792

A.   Types of service:

"Regular": Retrieval / pickup the next service day.

"Same day": Request is received before 10am; delivery will be made that service day. This type of service must be specified by the requestor (otherwise it is a "regular" service request).

"Rush": Service provided within two (2) hours of the request (but within regular business hours). This type of service must be specified by the requestor.

B.   Deliveries or pick-ups should be performed throughout the week (Monday-Friday). If a user requires delivery after hours, weekends or 2-hour rush retrieval /delivery, the Contractor will inform the user that their department will be charged for the delivery.

C.   Retrieval, refile and new storage requests received by 4:00pm will be delivered / picked up on the next scheduled run. Requests received on a Friday will be delivered / picked up on the following Monday.

D.   Under no circumstances will the Contractor perform nor charge MCI for Rush or After Hour *pickups*.

E.   Respond to service requests by electronic mail within two (4) hours of receiving the message. Electronic mail is the only acceptable method that should be used for service requests. Electronic mail confirmations will be sent to each service request, copying **all** addressees. The confirmations will include the number of cartons/files, the service order number and delivery date.

F.   New storage and refiles will be shelved, data entered, and fully processed within 72 hours of receipt.

G.   The Contractor will not retrieve MCI records for any reason other than responding to MCI service requests.

H.   If there is to be a delay in delivering records under a service request due to locating / retrieving the requested records, the Contractor will notify the requestor immediately by email, with a copy ('cc') to RIM. Notification should provide the reason for the delay and expected delivery reschedule. Under no circumstances should notification occur only at the point of delivery.

I.   The Contractor will obtain the signature of the individual receiving MCI records on a delivery.

CONSOLIDATED DATABASE

The consolidated database, maintained by MCI, refers to the merged descriptive and retention information for *all* MCI records stored offsite.

A.   The Contractor will provide consolidated datastrips to MCI in a mutually agreed upon format.

Records Management Program – Policies & Procedures ====

B.   Datastrips, will include all descriptive and retention information (listed in item I, herein, under General Requirements) for all of MCI's boxes in Contractors' system.

THE CONTRACTOR'S DATABASE

The Contractor shall use their computerized inventory control system to manage MCI's records.

A. Data entry will be performed with 99% accuracy. Redundant data entry will be used for barcode numbering.

   An error is defined as:
   Any incorrect data and/or Record Series Number, any transposition, missing digits, or incorrect descriptive information such that either the number is inaccurate or unusable for its intended purpose, or that the description if inaccurate or unusable for its intended purpose. Reasonable occurrences of missing punctuation, misspellings, inaccurate abbreviations etc. will not constitute errors.
   (For the "Record Classification Code" field, enter "RS" with the corresponding number entered by the submitter. For example: RS45.)

B. New storage and refiles will be shelved, data entered, and fully processed within 72 hours of receipt.

C. The Contractor's inventory control system will contain (at a minimum) the information listed under item I (herein), General Requirements.

D. The Contractor will receive and process into their data system any updates to the database submitted by MCI. The Contractor will ensure that these changes have been incorporated into the data provided to MCI via monthly reports.

E. The Contractor's system will automatically calculate destruction review dates for all new storage, based on retention periods from MCI's Record Retention Schedule, which will have been loaded into their system. If this is not possible, the Contractor will calculate the destruction review dates based on retention periods from MCI's RRS and enter the date into their system.

F. MCI will provide the Contractor with a diskette containing any changes to MCI's Record Retention Schedule, as soon as the change is adopted.

DESTRUCTION

Destruction of MCI records will be in accordance with industry standards. To include, or in addition to:

A. Contractor shall not destroy or purge any MCI boxes or information without written approval from RIM. Only RIM has the authority to approve destruction of boxes or information contained in Contractor's warehouse.

B. The destruction sequence to include the following:

Records Management Program – Policies & Procedures

1. Produce a Destruction Review Report listing all containers eligible for disposal. This report must be sorted by Record Classification Code. The report should provide a section in which MCI can indicate, for each container, instructions not to destroy containers or make changes to Disposal Dates or Retention Codes. Submit to MCI by November 15.

2. Upon receipt of the Destruction Review report back from MCI, any changes by MCI are entered and then reviewed by a supervisor.

3. Report Unavailable Items to MCI. After identifying authorized containers from the Destruction Review report, generate a listing of containers that are unavailable for disposal because they are out on retrieval at the customer. MCI will use this report to research the retrieval and contact the MCI user for status.

4. Verify that the containers pulled are those authorized on the Destruction Order (preferably utilizing bar code scanning).

5. The Contractor will ensure the security of MCI records during transport and actual destruction.

6. The Contractor will provide MCI a Destruction Certificate report after the completion of destruction. This report, signed by the Contractor, will list all the containers destroyed. It will include complete descriptive data for each container and will be accompanied by a description of where and when the destruction occurred and the method of destruction.

MCIWC031854

A 03795

APPENDIX F

Box Inventory Form

File-Level Inventory Form

Fax Order Form

APPENDIX G

Inventory Project Documents

Inventory Project Requirements and Expectations

1. A written estimate that outlines the full scope of the project and its costs is required. The estimate should include:

    - estimated start and completion date
    - labor (number of people, level (supervisor, etc.) and hours). Iron Mountain (IM) will identify if labor pool will be non-IM personnel, such as contractors or temporaries.
    - actual number of cartons
    - **condition of all cartons,** along with the number that requires a new carton
    - number of cartons that need to be inventoried, broken down by type of inventory (date range only, description only or both)
    - number and cost of data entry

2. At least one supervisor, who is an IM employee, will be responsible for any inventory project. IM will provide the name of the individual responsible for the inventory project and a phone number where that individual may be reached during business hours.

3. Project cost overruns should be discussed with MCI's Records & Information Management (RIM), prior to the costs being incurred. RIM, with input from IM, will evaluate the costs and the justification. RIM, if the costs are approved, will provide written approval to IM. It is RIM's expectation that such situations will be infrequent.

4. IM will submit to RIM, via e-mail, a weekly Inventory Project Status Reports by Monday of the following week. The status report should indicate, if applicable:

    a. The number of cartons inventoried;
    b. The number of cartons data entered;
    c. The number of cartons reboxed;
    d. The number of cartons shipped to RIM;
    e. If the project is on target for the indicated completion date;
    f. Any problems that may have occurred; and
    g. Any changes in IM personnel regarding the project.

5. Cartons that are retrieved within IM's warehouse, for this inventory project, will be outcarded to Chicha Barnes. IM will be able to identify, at all times, the location of all cartons retrieved for an inventory project.

6. RIM will supply the Inventory Form to be used for each inventory project; the form is titled "MCI Inventory Form – for Projects". IM will be responsible for copying the form to be used throughout the project.

7. IM will review the outside of each carton for data information. However, IM will not solely rely on any information written on the outside of cartons, especially if

the information is not available, logical or descriptive. Such terms as: miscellaneous files, general files, desk files, old files, or office files are unacceptable descriptions. If the information on the side of each carton is not clear or has unacceptable descriptions, IM will review the contents of the carton for the information. If IM still has difficulty with obtaining carton data, IM will call RIM in a weekly phone call with cartons in front of them so they can review what they see to the RIM contact.

8. IM will capture date range (from and/or thru dates) for all cartons missing this information. The From date is the oldest date, and the Thru date is the newest date. If the dates are not clearly written on the outside of the carton, IM will obtain the date range from the record contents inside the carton. If there is no clear "day" but month and year can be supplied, the from "day" will be the first day of a month and the thru "day" will be the last day of the month. If there is no clear day or month, but a year can be supplied, IM will span the entire year for the date range (i.e., 01/01/99 - 12/31/99).

9. IM will capture descriptions for all cartons that are missing this information. In providing descriptions, IM will review the contents of the carton to obtain descriptive information of its contents. If there is any question as to what the description should be for any particular carton, IM will contact RIM on a weekly basis with the cartons in front of them so they can review what they see to the RIM contact.

Examples are as follows:
a. If a carton contains multiple types of records, and there is no one clear description for the carton contents, IM will call RIM for instructions.
b. If IM determines that the contents of a carton are reports, IM may use the report name as a description, if the carton contains the same reports.
c. If IM determines the contents of a carton are canceled checks, IM may use "Canceled Checks" as a description; however, IM must also capture the bank name (ex., Canceled Checks, Bank of America).
d. If IM comes across cartons that contain postcard looking records, and it appears to be information regarding a customer requesting MCI services, IM should use the description of "Letters of Authorization" along with the program name that is on the front of the postcard.
e. If IM comes across cartons containing files with just names on them, they will need to open the file to determine if they are payroll records, personnel records or customer records.
f. If IM comes across cartons that contain various types of software manuals, the description should be "Software Application Manuals". If the cartons contain other types of system records, IM should be as descriptive as possible.

10. If IM comes across cartons that contain electronic media such as tapes, diskettes, microfiche or microfilm, IM will visually inspect the media to determine if it looks to be harmed in any way from being stored in the regular warehouse (i.e., rodent damage, water damage, heat damage which visibly shows melting, etc.). If

the media appears to be harmed, IM will inform RIM in their weekly status report along with barcode numbers and type of visible damage and descriptive data, if any. If the media appears to be fine, IM will put the carton of electronic media into climate control storage.

11. If IM comes across any cartons that contain office supplies, equipment, personal items, such as pictures, coffee mugs, or other non-record type cartons, IM will inform RIM in their weekly status report. RIM will follow-up with a message on what the disposition should be on the carton(s).

12. IM will fax completed inventory forms to RIM, on a daily basis, for review; RIM's fax number is: 703-886-0807. RIM will review the forms and assign record class codes. Any inventory form that is incomplete will NOT be assigned record class codes and will note the deficient area. Inventory forms will be reviewed within 72 hours of receipt by RIM and faxed back to IM. Only those forms with record class codes and stamped "Approved" by RIM should be entered to IM's system. Data entry will occur for cartons inventoried as the project progresses. All data for cartons that have had their inventory forms approved by RIM will be entered into IM's system within five business days of approval.

13. During RIM's review of the inventory form, if there is any question as to the validity of a description, RIM will contact IM's project supervisor. It will be IM's responsibility to go back and review the carton or inventory of its contents for a better description. Should IM experience difficulty in securing a description or other required information, RIM should be informed in the weekly status report.

14. During the inventory project, it is understood that IM may have to use new cartons for boxes that are deteriorating. IM will inform RIM in their weekly status report the number cartons that needed new boxes, if any. IM will carryover the barcode number from the old carton to the new one.

15. The inventory project will not be considered completed or finished until all data entry is completed; this includes the entry of record class codes for each carton, destruct review dates generated, and a full report mailed and received by RIM.

MCI BOX INVENTORY PROJECT ESTIMATE REQUEST
(For Cartons Currently in Iron Mountain Warehouse)

Date: **Expected IM Response Date:**

Iron Mountain District: **Account #:**

Request By: **Email:**

Telephone: **Fax:**

Address:

PURPOSE OF PROJECT: The purpose of this project is to capture all missing data information and enter all identified data for cartons currently located in Iron Mountain's warehouse, as indicated on the attached inventory report, by MCI's Records & Information Management.

Carton Inventory Request:

Number of Cartons that Need Dates Only:

Number of Cartons that Need Description Only:

Number of Cartons that Need Both Dates and Description:

Instructions:

1. The attached listing shows data entries for either date range, record class or both. Please enter these into your database system along with any typo changes.

2. Per the attached inventory report, the cartons that need date range inventory only will have a highlight in the date range field. Cartons that need description inventory only will have the description area highlighted. Cartons that need a complete inventory for both date range and description will have the barcode number highlighted.

3. MCI expects that Iron Mountain will fulfill the scope and our requirements of this project as outlined in the attached Inventory Project Requirements and Expectations.

A 03801

Records Management Program – Policies & Procedures

Iron Mountain Estimate:

Project Start Date: _____   **Project End Date:**
_____

Number of Hours: _____   **Number of People:**
_____

Type of Personnel to be Used (temporaries, contractors or permanent):
_____

Name of Project Supervisor:
_____

Phone Number of Project Supervisor:
_____

E-mail of Project Supervisor:
_____

Location where Inventory Project will be performed:
_____

Fax Number where Approved Inventory Forms are to be sent:
_____

Cost Breakdown:

    Retrieval:
_____

    Refile:
_____

    Supplies:
_____

    Labor (explain):
_____

    Other (explain):
_____

Total Cost: _____

Records Management Program – Policies & Procedures

Estimate By:

_____
                        (print name)

Phone: _____ **Fax:**

_____

Address:

_____

Email:

_____

Iron Mountain Signature & Date:

_____

MCI Approval By:

_____
                        (print name)

MCI Signature & Date:

_____

INVENTORY PROJECT PLAN FOR NEW JERSEY

OBJECTIVE: To ensure that all cartons currently located within the IM New Jersey warehouse contain all required data (date range, description and record class code) and that the data is entered into IM's computer system.

SCOPE: Identify all cartons that are missing, at least, one field of data information. IM will inventory cartons for any missing information, and RIM will provide record class codes where needed.

PROCESS:

1. Lisa will review the Inventory Report from IM New Jersey. Lisa will note cartons that need date range, description or both. Lisa will also note cartons where clarification on description is needed and make changes to record class codes as appropriate.

2. Lisa will forward Estimate Form, Inventory Report, and Project Requirements and Expectations to Phil Hasselvander so that he can make a copy of the package and then mail the original via overnight to Deborah Wood for response. Phil will also include a copy of the new Inventory Form in the package being sent to Deborah. Phil will keep a complete copy of the package within the department.

3. When the completed Estimate Request Form has been returned by IM, Phil is to seek approval of IM's estimate from Brenda Tate, and get her signature. Once signed, Phil will copy and send original to IM so that the inventory project can start.

4. Once the inventory project has begun, Phil will keep up on the status of the project through IM's weekly project status reports, and forward a copy to the other RIM members.

5. As faxed inventory forms are received, from cartons that have been inventoried, Phil will review the data information supplied, research and enter the record class codes, approve the inventory form and fax the form back to IM within 72 hours. Applying record class codes for the inventory project will take priority over regular day-to-day activities.

6. If there are problems with descriptions where Phil cannot give a record class code due to an incomplete description, Phil will contact the IM Project Supervisor immediately after reviewing the inventory forms. Phil will request that the carton be re-inventoried or have someone come to the phone with the carton in-hand and describe the carton contents. If Phil cannot figure out the contents of the carton, he should either connect Lisa into the call with IM, or request that the carton be permanently withdrawn and shipped to him.

7. If the carton is shipped to Phil due to problems with obtaining a description, Phil will review the contents once they are received. If the records have a retention

requirement, Phil will complete an inventory form for the carton, and have it stored in the D.C. area.

8. If cartons are identified as junk, supplies or other non-record type cartons, IM will inform Phil. The cartons will be shipped to Phil for disposition within MCI.

9. If problems continue regarding inadequate data information on the inventory forms, Phil will speak with Lisa regarding the problems. Phil and Lisa will contact the IM Project Supervisor and Deborah Wood regarding the issues.

10. Once the inventory phase of the project is complete and an inventory report is received, Phil and Lisa will review the report to ensure completion of the project.

11. Phil will also ensure that all data changes as marked on the inventory reports sent to Iron Mountain at the beginning of the project were made.

12. Once it has been determined by MCI that the project is complete, Phil will contact IM, in writing, informing them that we have determined that the project has been completed.

13. If problems occur during the inventory project, Phil will document all problems, in detail and in writing, to the Project Supervisor, Deborah Wood and Lisa regarding these problems.

A 03805

APPENDIX H

Destruction Review Spreadsheet

Destruction Review Memo

Appendix I

IRS Rev. Proc. 97-22

and

IRS Rev. Proc. 98-25

<u>URLs:</u>

Rev. Proc. 98-25 at: http://ftp.fedworld.gov/pub/irs-irbs/irb98-11.pdf. This is the IRS bulletin and it can be found on starting on page 7 through page 12.

Rev. Proc. 97-22: http://ftp.fedworld.gov/pub/irs-irbs/irb97-13.pdf - starting on Page 9 through page 11.

These bulletins load in Adobe.

Records Management Program – Policies & Procedures ▬▬▬▬▬▬▬

APPENDIX J

Listing of HR Records being imaged

LPP Approval Memo

HR RECORDS AND IMAGING

MCI images the following personnel and benefit records at the Human Resources office in Denver.

Agreement Records:

Data Security	Employee Reimbursement
Tuition Reimbursement	**New Products, Ideas, etc.**
Overpayment/Repayment	Confidentiality
Secrecy of Communications	**Commissions** Financial Forms
Relocation	

I-9 Records:

Application for SSN	Personal Data
I-9 Form	Employee Verification

Job-Related Records:

PAF/Salary Matrix	Transfer
Reclass	Adjustments
Promotion	New Hire
Leave of Absence	Termination
Merit	Rehire
Attendance Records	Warnings

Benefits Records:

Insurance	Medical Waiver
PIN Authorization	Benefits Enrollment
401K	Emergency Contacts
GULP	Dental
Benefits Status Change	HMO/Org Change Form
ESPP	Beneficiary Forms

Reviews/Performance Records

Payroll-related Records:

Direct Deposit	Deduction Worksheet
Tax Forms	United Way Authorization

Other Records:

Address Change	Application
Offer Letter	Letter of Commendation
Resume	Monitoring Forms

® Records Management has received approval from LPP to retain the above records on one imaging system (see Exhibit 13).

A 03809

APPENDIX K

Guide for New Acquisitions

Memo

Questionnaire

Records and Information Management

A Guide for New Acquisitions

Records Compliance Program

Welcome Aboard.

A Records & Information Management (RIM) Program is vital to MCI. As such, a records retention policy and program, as well as a formal Record Retention Schedule have been developed for company-wide use to minimize MCI's legal and financial risks. Each MCI employee is responsible for understanding the policy and complying with this *mandatory* program.

The definition of a record is any and all recorded information regardless of medium or specific characteristics, that is created, received, used or distributed by MCI in the course of business. This includes – but is not limited to: paper, microfilm, tape, microfiche, e-mail, PC hard drives, mainframes, voice mail, optical, intranet and other mediums.

On top of everything else you will be doing to integrate your business within MCI, Records & Information Management (RIM) needs some information in order to ensure that there is a smooth transition of your records into MCI.

* A contact name and number of an individual that can assist in accessing all of your company's records.

* A list of all your business locations with full addresses and phone numbers. The list should also contain what record types are located in each location, in what media form, and whether that location is using off-site storage.

* If off-site storage is being used, please provide the name, location, account number, contact name and phone number of the off-site storage vendor; also, a copy of the contract, price listing and inventory report. This includes all storage locations; records management/storage companies, internal storage locations and self-storage facilities.

* A copy of your company's record retention program and procedures or something in writing indicating your company's records management.

While your records program is being evaluated by RIM, absolutely no records destruction of any kind can take place. While going through the transition, if you find that you are in need of offsite storage, please contact RIM.

Employees should be informed that any company records that are being used or retained in their homes, garages, cars, etc. must be returned to the office.

Until you are able to access MCI's intranet, attached you will find an overview of our records program and procedures, also the Records Retention Schedule (RRS) in PDF format. If you cannot access the PDF file contact RIM and a copy will be sent via first-class mail. Once you can access the company's intranet, you can become fully indoctrinated in to our Program via RIM's website at: https://teamnet2.mcilink.com/departments/rim/.

If you have any questions or concerns, please contact:
James Green, 703-886-3364, James.Green@mci.com
Joe Stephens, 703-886-3401, Joe.W.Stephens@mci.com
Phil Hasselvander, 703-886-3398, Philip.H.Hasselvander@mci.com
Darrell Daniels, 703-886-3378, Darrell.Daniels@mci.com
Christopher Moses, 703-886-7117, Christopher.Moses@mci.com
Michael Simms, 703-886-1252, Michael.L.Simms@mci.com
Charles McBride, 703-886-3831, Charles.Mcbride@mci.com
Brenda Tate, Sr. Manager of Audit & Control, 703-886-3538, Brenda.Tate@mci.com
Joyce Moultry, Manager, Records & Information Management, 703-886-3336, Joyce.Moultry@mci.com

Π *Throughout the attached guideline numerous references are made to the RIM website. If you do not have access to this website yet, and have need for offsite storage, please contact RIM and we will assist in providing services with the appropriate storage vendor.*

TABLE OF CONTENTS

A 03813

Records Management Program – Policies & Procedures

RECORDS MANAGEMENT PROGRAM OVERVIEW

The following guidelines explain how to use MCI's Records Retention Schedule (RRS), how to manage MCI's records *in all media forms*, how and when to send records to off-site storage.

The RRS has been approved by the Law & Public Policy (LPP) department as the company-wide policy on records retention. Use the RRS to determine which records your department is responsible for retaining, and for how long.

The objectives of the Records Management Program are to:

➢ Ensure that MCI is meeting all local, state, federal and operational record-keeping requirements.

➢ Reduce costs by ensuring records will be available in the event of a litigation or financial issue.

➢ Efficiently identifies records that must be retained and specifying their life cycle.

✪ Compliance is mandatory.

Records & Information Management's responsibilities are to:

➢ Develop record management policies and procedures.

➢ Assist in identifying and protecting vital records.

➢ Monitor compliance with record management procedures and the RRS.

➢ Research and assign retention periods to records company-wide.

➢ Educate and train employees in all areas of record management.

➢ Provide assistance in storage, retrieval and disposition of records.

➢ Work with legal, tax and storage vendors to dispose of eligible records.

➢ Maintain/monitor a database of records stored off-site.

➢ Recover records which have been withdrawn for an excessive amount of time.

MCIWC031873

A 03814

GUIDELINES

Π *Throughout this guideline numerous references are made to the RIM web site. If you do not have access to this website yet, please contact RIM to assist with any service requests.*

Adherence to the Records Program

In order to ensure MCI's compliance with all local, state and federal record-keeping requirements and for MCI's operational needs, all MCI employees must adhere to the Record Management Program.

What is a Record?

A record is any or all recorded information, regardless of medium or specific characteristics, created, received, used or distributed by MCI in the course of its business. This includes – but is not limited to - paper, microfilm, tape, microfiche, e-mail, PC hard drives, mainframes, voice mail, optical, intranet and other mediums.

Only the *official copyholder* of a record is required to retain a record for the total retention period indicated in the MCI Record Retention Schedule (RRS). If you maintain originals, you are the official copyholder. Creating a record does not mean you are the official copyholder; you must also maintain the original. Copies should not be stored or kept once your operational need is completed, there are no exceptions.

Vital Records

A Vital Record is the recorded information that is essential for the continuation or reconstruction of an organization. Vital records help establish the legal and financial position of MCI, and are critical to preserving the rights of the organization, its employees, customers and stockholders. Roughly two to six percent, of MCI's records are identified as "Vital."

When reviewing the Records Retention Schedule (RRS) (discussed later), if you see a "V" in the Comments column, this means that particular record is a vital record.

The Records Retention Schedule (RRS)

The RRS is a tool to determine time frames for the retention of *all* records and information created, received, used, and distributed by MCI. It is modified on an as needed basis by the Records Management Department, Law & Public Policy (LPP) and Tax departments, to reflect changes in the company's organizational structure, and/or changes in applicable record-keeping laws/regulations. The RRS is the *only* reference tool used in determining retention/disposition actions for MCI's records. Retention determinations independent of the RRS are strictly prohibited. You will also use the RRS to determine the Record Series number for specific records when placing records in storage.

A 03815

As shown in the example below, the RRS groups "like records" first by major function (Primary Classification), and then by type of record within that function. The RRS gives descriptions of each record series, along with the *total retention period* for which records must be retained before consideration for disposition.

PRIMARY CLASSIFICATION: ACCOUNTING

Page 1

RS #	RECORD SERIES	DEFINITION	TOTAL	COM
	1 ACCOUNTING	The management of receipts and expenditures, cost accounting and payroll, and the auditing of said functions.		
5	2 Audits	Audits of accounting records and/or procedures, including backup materials such as Internal Document Requests (IDRs)	C + 7	FA, V
	2 Cash			
12	3 Accruals	Information concerning cash forecast and related accounts, such as Cash Forecast Reports, Cash Accrual Reports, etc.	1	

RS # – The Record Series Number that uniquely identifies each type of record.

RECORD SERIES - A grouping of like records by type.

DEFINITION - Used to describe a particular Record Series, often includes sample document types.

TOTAL - The total length of time (number of years) that a Record Series must be retained.

> **Note:** Some time periods are preceded by a letter. The letter is an abbreviation for a record occurrence (i.e., termination or completion of a contract). For example, C + 15 for a contract means that the contract needs to be retained for 15 years after the contract is canceled, completed or closed. There is a key to these abbreviations ("*Key to Comments and Abbreviations*") at the end of the RRS listing.

COM - Comments concerning any unique retention requirements affecting a Record Series (see the "*Key to Comments and Abbreviations*").

Record Series Number

Under the Primary Classifications, groupings of like records have been assigned unique Records Series names, numbers, and definitions. For example:

```
RS#
        1 HUMAN RESOURCES
            2 Benefits
                3 Disability
    356         4 Claims        Documentation concerning disability claims, including short or long
                                term claims.

        1 LEGAL
            2 Contracts/Agreements
```

Records Management Program – Policies & Procedures

284	3 Purchase	Legally binding agreements/contracts between MCI and another party for goods, such as purchase of hardware and software; backup materials such as bids, proposals, vendor information, etc.

Locate the Records Series (RS#) number associated with your record:

1)   Scan your record to gain an understanding of the main topic.

2)   Identify the Primary Classification for your record, i.e., is this an accounting record, human resources, financial etc.?

3)   Review the record classifications under your selected Primary that best describes your record and identify the associated RS#.

Locate a Record Series number using the website:

To locate a record series number using the website, go to the Searchable Records Retention Schedule. The searchable RRS will allow you to search for a record series number using a key word in the definition field.

Once you have obtained your search results, read each record series description to determine which record series is applicable to your type of record.

Destruction Review Date

Using the example shown below, the destruction review date for a particular record series is determined as follows:

Example:

RS#	RECORDS SERIES	TOTAL	COM
	1 LEGAL		
	2 Contracts/Agreements		
285	3 Other	C + 15	SL, V

A purchase agreement put into effect in 1992, and closed in 1995, would be *eligible* for destruction in 2010 (15 years after it is closed).

If you are the official copyholder of RS# 285, the total retention period is C+15.

You are only responsible for the disposal of records within your office. Any records off-site that are eligible for destruction (have met their retention requirements), will be destroyed by Records Management after being reviewed by LPP and Tax.

Off-Site Storage

Off-site storage is to be used for inactive records. If you need to place active records into storage due to space limitations on-site, please contact RIM for special storage procedures.

MCI has approved off-site storage contracts with several different vendors.
Iron Mountain is MCI's national vendor for off-site record storage. There are five other storage vendors:

Kenwood Records Management, Cedar Rapids, IA
Storage Plus (Five R, Inc.), Tulsa, OK
Mississippi Filing, Jackson, MS.
Datalok, Carson, CA
Recall Storage, San Leanandro, CA

Off-Site Storage Services

MCI's off-site storage vendors offer a number of services. RIM encourages the use of off-site storage for all records with a retention requirement. Each off-site storage facility is designed to handle paper records, as well as electronic media, and is better prepared to handle disasters, such as flood, tornadoes, and fire, then any MCI facility.

The advantages of off-site storage are multiple. The obvious is to free-up on-site storage space. The storage vendors contracted by MCI respond to requests for pick-up and retrieval within 24-48 hours, so your records are readily accessible. Cartons along with their descriptive data are entered in to a database upon receipt at the vendor's site. MCI has the ability to query this data in order locate records when needed.

Records Management (RIM) pays all costs relating to off-site storage services, except for two-hour rush requests and when the requestor or his/her stated alternate are not available when the vendor responds to a request, these instances are charged back to your department.

The most important advantage is that MCI's records are reviewed under an established and approved policy. The use of off-site storage also minimizes any risks MCI may encounter related to their records. Since all records in storage must be identified using an inventory form which identifies the record type, required retention through the record series and full description, we know what we have, what we have to keep and where it is. Knowing where our records are is essential for MCI in order to do business effectively and efficiently.

Handling Instructions for Paper, Microform, and Electronic Records

Paper Records:

Place all records in manila file folders. Do not send cartons of loose papers, ring binders or hanging folders. Computer printouts should be removed from binders and laid flat in cartons.

All Managers' working files for employees should be sent to the HR Fileroom (9835/700) once an employee no longer works for the company or your department. If an employee transfers to another department, you should send any manager notes regarding the employee

84

to the HR Fileroom. It is acceptable; however, to give the new manager the employee's attendance record, performance review and PAF, but you cannot give those notes or written comments that are about or concern the employee.

For the records within your department that are considered copies, there is no retention value. This includes records such as day-timers, appointment books, calendars, telephone messages, reports generated from the mainframe, personal meeting notes and copies of any records where the original was sent to another department. These types of records should not be retained for longer than one year.

Microform:

Place microfilm in protective cartons, and microfiche in jackets. Microfilm, microfiche, tape, imaging platters, and other types of electronic media need to be stored in the vendor's climate control vault.

Electronic Records:

Because of their small size relative to the amount of information they contain, diskettes and magnetic tapes may not require transfer to off-site storage. If such records are to be moved off-site, they should be stored in closed cartons, in humidity/temperature controlled storage sites. MCI's approved storage vendors are equipped to handle this type of storage. Do not use diskettes for long-term storage, since they are not designed for this purpose.

If decommissioning a system, several factors need to be reviewed. If the system contains financial information/data, the tax department needs to be notified before the system is decommissioned. Any data contained on the decommissioned system that has a retention requirement must be retrievable and readable until it has fulfilled its retention requirement. The data does not have to be in the same format as it was on the decommissioned system; however, none of the data may be altered. If the data is in a database format, the database may be saved in a flat file format, so that it may be read on any system. Documentation of the data conversion should be created to prove that it was only converted, and that the value or significance of the data had not been changed.

If data contained on a system can only be read with a particular program, the program must be retained for the life of the system, and then migrated to the new system, or until the retention requirement for the data has been reached.

When to send records to off-site storage

At least once a year, usually following the end of the calendar or fiscal year, the RRS should be reviewed by the department's Manager to determine which of their records should be transferred to off-site storage or destroyed.

It is recommended that when your department's operational need for any records is complete, and need to be retained according to the RRS, the records should be transferred to off-site storage for safekeeping.